

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

CAMRON TRIMBLE

Case: 2:22-mj-30078

Case No. Judge: Unassigned,
Filed: 02-16-2022 At 03:23 PM
USA v. SEALED MATTER (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 10, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 16, 2022City and state: Detroit, Michigan*Complainant's signature*

Task Force Officer Jeb Rutledge, ATF

*Printed name and title**Judge's signature*

Hon. Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Task Force Officer Jeb Rutledge, being first duly sworn, hereby state:

I. INTRODUCTION

1. I am a duly sworn Police Officer currently holding the rank of Detective with the City of Detroit, MI. I have been with the Detroit Police Department since 1998 and appointed to Detective in 2014. In my 22 years as a Detroit Police Officer, I have worked numerous assignments including: Uniformed Patrol, plainclothes Precinct Special Operations, Breaking and Entering Task Force, Precinct Detective Unit, and Homicide. During my career, I have been involved in or have been the Officer in Charge of hundreds of investigations that range from larcenies to violent assaults and homicides. I transferred to the Bureau of Alcohol, Tobacco, Firearms, and Explosives, Firearms Investigative Team (ATF/FIT) in August 2020 and was sworn in as a Task Force Officer in November 2020.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. I have personal knowledge or have been provided with information by other law enforcement officers. I have not included each and every fact known to law enforcement concerning this investigation, only facts necessary to establish probable cause CAMRON DEMON TRIMBLE (B/M; DOB: xx/xx/1995), a convicted felon, possessed a firearm, while in a vehicle, within the city of Detroit, in violation of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

4. On February 11, 2022, a query of the Michigan Law Enforcement Information Network (LEIN) showed the following criminal history for TRIMBLE:

- a. October 22, 2013 – Guilty Plea – Felony Unlawful Driving Away of an Automobile and Felony Receiving and Concealing a Stolen Motor Vehicle – Third Circuit Court of Michigan, Wayne County. TRIMBLE received a sentence of two years’ probation.
- b. October 8, 2014 – Nolo Plea – Felony Retail Theft \$5,000-\$10,000 – Waukesha County Circuit Court. TRIMBLE received a custodial sentence of six months’ jail, followed by three years’ probation.
- c. January 06, 2016 – Nolo Plea – Felony Retail Fraud First Degree – Sixth Circuit Court of Michigan, Oakland County.

TRIMBLE received a custodial sentence of 1 year in the Oakland County Jail.

- d. January 13, 2016 – Guilty Plea – Felony Resisting and Obstructing Police – Sixth Circuit Court of Michigan, Oakland County. TRIMBLE received a custodial sentence of 1 year in the Oakland County Jail.
- e. On December 12, 2016 – Guilty Plea – Felony Theft – Hamilton Indiana Superior Court. TRIMBLE received a custodial sentence of 498 days’ jail.
- f. February 26, 2018 – Guilty Plea – Felony Retail Fraud First Degree – Sixth Circuit Court of Michigan, Oakland County. TRIMBLE received a custodial sentence of 18 months to 15 years in the Michigan Department of Corrections (MDOC).
- g. March 18, 2021 – Felony Carrying a Concealed Weapon; Felon in Possession of a Firearm; and Felony Stealing or Retaining a Financial Transaction Device Retail Fraud First Degree – Sixth Circuit Court of Michigan, Oakland County. TRIMBLE received a sentence of two years’ probation. MDOC Probation on this case is still active.

5. TRIMBLE has been convicted of numerous felonies, including the charge Felon in Possession of a firearm. He has served multiple custodial sentences and is currently still under the supervision of the Michigan Department of Corrections. There is probable cause to believe TRIMBLE is aware of his status as a convicted felon.

II. PROBABLE CAUSE

6. In October 2021, Detroit Police obtained a search warrant for TRIMBLE's Instagram account. Detroit Police identified the Instagram profile "nobraakescam" as belonging to TRIMBLE because of the account's name and content posted to the account.

7. In February 2022, I reviewed the Instagram Profile associated with Instagram User ID "nobraakescam." I identified TRIMBLE as the user of the Instagram account by comparing the individual depicted as the Instagram user in the profile photographs, along with other images posted by the user, to TRIMBLE's prior arrest photographs, including Image 7a:



Image 7a

8. I reviewed the return provided by Instagram in response to the Detroit Police Department's search warrant. The return included photographs and videos posted by TRIMBLE to his "nobrakescam" account.

9. On October 10, 2021, at approximately 6:26 p.m., Instagram User ID "nobrakescam" utilized the Instagram Live feature to live stream a video to the Instagram user's account. The Instagram Live video was then saved to the user's account as a file ending in the numbers 4470. On the same date at approximately 6:32 p.m., Instagram User ID "nobrakescam" again utilized the Instagram Live feature to live stream a video to the Instagram user's account. The Instagram Live video was then saved to the user's account as a file ending in the numbers 1783. I reviewed both videos. The first video is approximately five and a half minutes long. The second video appears to begin immediately after the first video concludes.

10. While reviewing the first video (file 4470), I made the following pertinent observations:

- a. TRIMBLE is seated in the driver's seat of a moving vehicle. He is the only occupant in the vehicle. At 01:38, TRIMBLE points the camera to the front passenger seat to display what appears to be a black handgun with an extended magazine. See Image 10a:



Image 10a

- b. At approximately 02:42, TRIMBLE says “you know I gotta keep my G-lock” and picks up the handgun and appears to tap the firearm against the camera. See Image 10b:



Image 10b

- c. At approximately 03:11, TRIMBLE allows another Instagram user to join his Live video. The video ends at 05:37.

11. While reviewing the second video (file 1783), I made the following pertinent observations:

- a. The second video appears to be a continuation of the first video. It begins after the first video ends, TRIMBLE appears to be wearing the exact same clothes, driving the same vehicle, and carrying the same handgun.
- b. At approximately 00:56, TRIMBLE picks up the handgun and shows the base plate, located on the bottom of the magazine—which has a visible and distinctive Glock marking—to the camera. See Image 11b:



Image 11b

- c. At 00:58 TRIMBLE pulls the gun back, and the front of the barrel is visible. See Image 11c:



Image 11c

- d. At approximately 04:16, TRIMBLE states “alright, I’m done with this Live” and stops the recording.

12. I consulted with Special Agent Kenton Weston of the Bureau of Alcohol, Tobacco, Firearms and Explosives regarding the firearm in TRIMBLE’s possession in the October 10, 2021 Instagram Live video. Per Agent Weston, the firearm appears consistent with being a Glock 26 Gen 5 pistol or Glock 27 Gen 5 pistol. Both are subcompact models. The exterior of a Glock 26 Gen 5 pistol is nearly identical to that of a Glock 27 Gen 5 pistol, with minor exceptions such as lettering on one side of the slide.

13. The firearm TRIMBLE is brandishing in the video has the following characteristics consistent with Glock 26 and 27 Gen 5 pistols: the shape of the thumb groove, the metallic slide lock, the shape of the slide, the slots and serrations on the slide, the text box containing the patent and manufacturing information on the handle, the unique shape of the grip, and the trademarked Glock logo on the base plate of the extended magazine inserted into the firearm.

14. Image 14a is a mirrored stock image of a Glock 26 Gen 5 compared to the firearm in TRIMBLE’s first video at 02:47 (Image 14b):



Image 14a



Image 14b

The firearm in Image 14a is equipped with a stock magazine, which holds 10 live rounds of ammunition. Subcompact Glock firearms such as Glock 26 Gen 5 pistols and Glock 27 Gen 5 pistols are capable of accepting Glock magazines designed for full-size firearms of the same caliber. The firearm in TRIMBLE's October 10, 2021 Instagram Live video (Image 14b) appears to be equipped with a full-size Glock magazine capable of holding 15 live rounds of ammunition.

Additionally, the firearm depicted in Image 14b appears to be equipped with a backstrap, which is an optional feature designed to improve marksmanship by adapting the pistol to an individual shooter's hand size.

15. Image 15a is a mirrored stock image of a Glock 26 Gen 5. Image 15b is a screenshot of the firearm in TRIMBLE's second video at 00:58.



Image 15a



Image 15b

16. I am extremely familiar with Glock pistols as I have seized and investigated dozens of Glock firearms and have also carried Glock pistols in the performance of my official duties for nearly twenty-two (22) years. The firearm TRIMBLE brandishes in his October 10, 2021, Instagram Live video appears consistent with a Glock firearm.

17. On February 14, 2022, ATF Interstate Nexus Expert, Special Agent Michael Jacobs, reviewed the above screen captures of the Glock pistol and confirmed it appeared to be a Glock pistol. Special Agent Jacobs advised Glock pistols are firearms as defined under 18 U.S.C. § 921 and manufactured outside of

the state of Michigan after 1898, and therefore travel in and affect interstate commerce.

18. TRIMBLE is a resident of the Eastern District of Michigan. On October 10, 2021 through the present TRIMBLE was and has been under the supervision of the Michigan Department of Corrections. TRIMBLE has reported to MDOC that he is residing at an address in Detroit, Michigan. TRIMBLE also reported to MDOC that his phone number is (313) XXX-3918, which I recognize as a phone number local to metro-Detroit. It is a term of TRIMBLE's MDOC supervision that he cannot leave the state of Michigan without permission. TRIMBLE did not request permission to leave Michigan on October 10, 2021.

19. On October 11, 2021, TRIMBLE posted five photographs to his Instagram account: Instagram User ID "nobrakescam." The photographs are publicly available. In the photographs, TRIMBLE is wearing the same hat, chain, and sweatshirt he was wearing during the October 10, 2021 Instagram Live video. I know it is common for Instagram users to post photographs to their accounts a day or more after they are taken. Image 19a is a screenshot of one of the photos posted by TRIMBLE to his account on October 11, 2021. Image 19b is a screenshot of TRIMBLE's October 10, 2021, Instagram Live video. Image 19c is a close-up of Image 19a. Image 19d is the same image as 19b mirrored so the "sliding or hiding" label on TRIMBLE's sweatshirt is facing the correct way.



Image 19a



Image 19b



Image 19c



Image 19d

20. In TRIMBLE's October 11, 2021, Instagram post, I recognize the street he is standing on to be the 17400 block of Mackay Street in Detroit, Michigan 48212. Image 20a is a Google Maps screenshot on the 17400 block of Mackay Street, facing North.



Image 20a

III. CONCLUSION

21. Based upon the aforementioned facts stated herein, there is probable cause to believe CAMRON TRIMBLE, a convicted felon aware of his felony conviction, did knowingly and intentionally possess one Glock pistol, in a vehicle, in the Eastern District of Michigan, while broadcasting live on Instagram. The Glock pistol was manufactured outside the state of Michigan and affected interstate commerce. Therefore, TRIMBLE was in violation of 18 U.S.C. § 922(g)(1), being a felon in possession of a firearm.

Respectfully submitted,



Jeb Rutledge, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ANTHONY PATTI
UNITED STATES MAGISTRATE JUDGE

Date: February 16, 2022